



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

NOV 23 2005

Mr. D.E. Williams
Chief Technologist: Specialist & Consultants
Peldev
P.O. Box 582
Pretoria, 0001

Ref No.: 04-0007

Dear Mr. Williams:

This is in response to your letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the periodic inspection and testing of specification DOT 51 portable tanks under § 180.605. We apologize for the delay and hope it has not caused you any inconvenience. Specifically, you asked if a DOT 51 specification portable tank may be periodically inspected and tested by a third party or accredited testing station since there are no DOT approved testing stations in South Africa other than the South African Airways.

The answer to your question is yes. Either of the test agencies described in your letter may perform the periodic retest requirements for DOT Specification 51 portable tanks. The requalification requirement in § 180.605 (c)(2) specifies a five year test interval, but there is no requirement for such test to be performed by an approved third party testing agency. The tank owner or user may have the tank inspected and tested by any qualified tester of his or her choosing.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



040007

178.245
180.605

P O Box 582, Pretoria, 0001
Tel: +27 12 3054132
Fax: +27 12 3054461
E-Mail: deswill@peldev.necsa.co.za



REC'D
U.S. DOT
OFFICE OF CHIEF COUNCIL

29 November 2003

Office of the Chief Council
U.S. Department of Transportation
400 Seventh Street
SW Washington
DC 20590-0001

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Webb

§ 178.245-
§ 180.605
Portable Tank
04-0007

Dear Sir

REQUEST FOR GUIDANCE AND INTERPRETIVE ASSISTANCE

The scenario

At present APCI – Hometown Facility is supplying Anhydrous Hydrogen Fluoride to its customers in Singapore. At the end of March 2004 it will be shutting down its production plant and disassembling it. APCI have approach the Fluorochemical Division of the South African Nuclear Energy Corporation to take over the contract with Singapore. Pelchem exports AHF all around the world at present and has all the approved infrastructures and approvals in place.

The questions

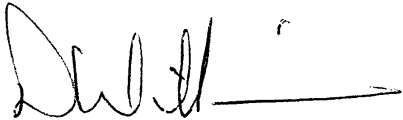
1. The containers to be used are APCI owned DOT 51 specification portable tanks – CFR 178.245. These will now only be moving between Singapore and Pretoria in South Africa. Thus, will it be acceptable to have the periodic inspection and test once every five years (CFR 180.603 and 180.604) done by a SANS (formerly SABS) accredited testing station, as there are no DOT approved testing stations in South Africa other than the South African Airways – ID number D010 which is a class “B” tester.

2. Would any of the DOT accredited companies based in Singapore who are all rated as "Tester Class B" fulfil the requirements to keep the tanks DOT legal.

Final note

The tanks will not be returning to the USA in the future.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D E Williams', followed by a horizontal line extending to the right.

D E WILLIAMS

CHIEF TECHNOLOGIST: SPECIALISTS & CONSULTANTS – E&T